

Andrew Isar, Director - Industry Relations

Telecommunications Resellers Association 4312 92nd Ave., N.W. REC D_{Te}l. 106-265-3910 Gig Harbor, WA 9833 RECULATO RAK: 2011-265-3912

'98 JAN 12 PM 1 20

OFFICE OF THE EXECUTIVE SECRETARY

Via U.S. Mail

9 January 1998

Mr. Paul Allen Executive Director Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: BellSouth Telecommunications' Entry into Long Distance (InterLATA)

Service in Tennessee Pursuant to Section 271 of the Telecommunications

Act of 1996 (Docket No. 97-00309)

Dear Mr. Allen,

Please find enclosed an original and fourteen (14) copies of the Telecommunications Resellers Association's *Petition for Leave to Intervene* in the above-referenced proceeding, along with a filing fee of \$25.

Questions may be addressed to me.

Sincerely,

Telecommunications Resellers Association

Andrew O. Isar

BellSouth Telecommunications' Entry
into Long Distance (InterLATA) Service
in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996

REC'D TN
DECLY ATORY AUTH.

98 JAN 12 PM 1 20
OFFICE OF THE
DOCKAL CUDING OFFICE OF THE

PETITION FOR LEAVE TO INTERVENE

The Telecommunications Resellers Association ("Association"), on behalf of its members and pursuant to the Tennessee Regulatory Authority's ("TRA") February 13, 1997 Staff Report on the Telecommunications Act of 1996, hereby respectfully petitions TRA for leave to intervene in the above-captioned proceeding. In support of its petition, the Association submits the following:

- 1. The Telecommunications Resellers Association is a national trade association representing more than 650 telecommunications service providers and their suppliers who are engaged in providing a variety of value-added interexchange, local, wireless, and enhanced telecommunications services. Several Association members are certified by TRA to provide telecommunications services within the state of Tennessee, and six members maintain corporate headquarters within Tennessee.
- 2. Association members are generally small to medium-sized telecommunications service providers. As providers of telecommunications services, the Association's members have a substantial and material interest in the matters raised by BellSouth Telecommunications' compliance with Section 271 of the Telecommunications Act of 1996 for in-region interLATA market entry in Tennessee, and therefore in the outcome of this proceeding. There are no other parties to this proceeding who can address adequately the concerns of the Association or provide its members' perspective.

3. The Association wishes to intervene for the limited purposes of monitoring the proceeding and submitting responsive comments as appropriate. The proposed intervention by the Association will not unduly broaden the issues involved in this proceeding or prejudice other parties.

4. The name and address of the individual to receive documents and communications regarding this proceeding is:

Andrew O. Isar Director - Industry Relations Telecommunications Resellers Association 4312 92nd Ave. NW Gig Harbor, WA 98335 Phone: 253.265.3910

Fax: 253.265.3912

WHEREFORE, the Telecommunications Resellers Association respectfully requests that TRA grant its petition for leave to intervene in this proceeding.

Respectfully submitted,

TELECOMMUNICATIONS
RESELLERS ASSOCIATION

Andrew O. Isar

Director - Industry Relations

4312 92nd Ave. NW

Gig Harbor, WA 98335

Phone: 253.265.3910 Fax: 253.265.3912

9 January 1998

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the Telecommunications Resellers Association's *Petition for Leave to Intervene* was served on January 9, 1998 via U.S. Mail on the following parties:

Shelly K. Speir

Harbor Consulting Group Inc.

P.O. Box 2461

Gig Harbor, WA 98335

Phone: 253.265.3910 Fax: 253.265.3912

Alaine Miller NextLink 155 - 108th Ave. NE, Ste. 810 Bellevue, WA 98004

Telecommunications Act of 1996

Chuck Welch Attorney for Time Warner 511 Union Street, Ste. 2400 Nashville, TN 37219

Dana Shaffer, Esq. NextLink 105 Molloy Street, Ste. 300 Nashville, TN 37201

Nashville, TN 37219-2386

Gif Thornton
Attorney for BellSouth Long
Distance
424 Church Street, 28th Floor

James P. Lamoureux AT&T 1200 Peachtree Street NE, Room 4068 Atlanta, GA 30309 Bennett Ross BellSouth Telecommunications 675 W. Peachtree Street, Ste. 4300 Atlanta, GA 30375

Claire Daly LDDS WorldCom 201 Energy Parkway, Ste. 200 Lafayette, LA 70508

Don Baltimore Attorney for LDDS 211 Seventh Ave., Ste. 320 Nashville, TN 37219-1823

Guy Hicks BellSouth Telecommunications, Inc. 333 Commerce Street, Ste. 2101 Nashville, TN 37201-3300

Jon Hastings Boult Cummings Conners & Berry P.O. Box 198062 Nashville, TN 37219 Carolyn Tatum Roddy Sprint 3100 Cumberland Circle Atlanta, GA 30339

D. Billye SandersAttorney for TCG MidSouth511 Union Street, Ste. 2100Nashville, TN 37219-1760

Douglas W. Kinkoph LCI International 8180 Greensboro Drive, Ste. 800 McLean, VA 22101

Henry Walker Boult Cummings Conners & Berry P.O. Box 198062 Nashville, TN 37219

Martha McMillin MCI 780 Johnson Ferry Road, Ste. 700 Atlanta, GA 30342

CERTIFICATE OF SERVICE DOCKET NO. 97-00309

Michael McRae Sr. Regulatory Counsel - TCG MidSouth 2 Lafayette Centre 1133 21st Street, Ste. 400 Washington, D.C. 20036

Val Sanford Attorney for AT&T P.O. Box 198888 Nashville, TN 37219-8888 Susan Davis Morely Wiggins & Villacorta P.A. 501 E. Tennessee Street P.O. Drawer 1657 Tallahassee, FL 32302

Vince Williams Consumer Advocate 426 5th Avenue North 2nd Floor, Cordell Hull Bldg. Nashville, TN 37243-0500 Thomas Allen, Vice President InterMedia Communications 3625 Queen Palm Drive Tampa, FL 33619-1309